

**PARKER AND CARMODY, LLP**

**ATTORNEYS AT LAW  
30 EAST 33<sup>RD</sup> STREET  
6<sup>TH</sup> FLOOR  
NEW YORK, N.Y. 10016**

DANIEL S. PARKER  
MICHAEL CARMODY  
CHRISTINA S. COOPER

TELEPHONE: (212) 239-9777  
FACSIMILE: (212) 239-9175  
DanielParker@aol.com

April 30, 2021

**By ECF**

Hon. Laura Taylor Swain  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Cristian Ulmanu  
19 Cr 651 (LTS)**

Dear Judge Swain:

I write with the consent of AUSA Samuel Rothschild requesting that the grant the attached request pursuant to the CARES Act and schedule a remote guilty plea proceeding in this matter in the immediate future. It is my understanding that the Court is available on May 20, 2021, pending scheduling with the MDC where Mr. Ulmanu is incarcerated.

Attached to this letter is an Application and proposed Order pursuant to the CARES Act, setting forth the basis for our request to go forward by a remote proceeding – by video or telephone.

Thank you for your attention to, and consideration in, this matter.

Respectfully submitted,



Daniel S. Parker  
Parker and Carmody, LLP  
30 East 33<sup>rd</sup> Street  
6<sup>th</sup> Floor  
New York, NY 10016  
Cell: 917-670-7622

Cc: AUSA J. Rebold (By ECF and email)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
UNITED STATES OF AMERICA

**MEMO ENDORSED**

v.

**APPLICATION**

**19 Cr 651 (LTS)**

CRISTIAN ULMANU,

Defendant.

---

DANIEL S. PARKER hereby affirms, under penalty of perjury and pursuant to Title 28, United States Code, Section 1746, as follows:

1. I represent CRISTIAN ULMANU, the defendant in this case.
2. Mr. Ulmanu has decided to plead guilty and has requested that a guilty plea hearing be scheduled in the immediate future.
3. Mr. Ulmanu, who is currently incarcerated in the Metropolitan Detention Center (MDC) wishes to proceed with the guilty plea proceeding by video or telephone conference instead of an in-person proceeding in light of the ongoing pandemic.
4. During this pandemic, video and telephone conferencing have been employed by judges in the Southern District of New York on numerous occasions.
5. Mr. Ulmanu has requested that a remote court appearance be scheduled on May 20, 2021.
6. We submit that pursuant to § 15002 (b)(2) of the Coronavirus Air, Relief, and Economic Security (“CARES”) Act, that proceeding by video or telephone conference with a guilty plea hearing advances Mr. Ulmanu’s case, allows the Government and defense to achieve finality in the case, and furthers justice without undue delay.

7. Mr. Ulmanu was presented in this District in December 2019 and he has been incarcerated since that time.

8. We submit that any further delay in this proceeding would result in serious harm to the interests of justice.

9. Proceeding by video or telephone conference with a guilty plea hearing advances Mr. Ulmanu's case, allows the Government and defense to achieve finality in the case, and furthers justice without undue delay. *See* § 15002 (b)(2) of the Coronavirus Air, Relief, and Economic Security ("CARES") Act.

10. Based upon the foregoing, we respectfully request that the Court issue an Order, directing that the guilty plea hearing go forward by video or telephone conference on the next date.

Dated: New York, New York  
April 30, 2021

For the reasons stated herein, the Court finds that the change of plea hearing in this case cannot be further delayed without serious harm to the interests of justice. By separate order dated April 29, 2021, the Court has tentatively scheduled the change of plea hearing for May 20, 2021, at 9:00 a.m. Docket entry 625 is resolved.

SO ORDERED.

4/30/2021

/s/ Laura Taylor Swain, Chief USDJ



---

DANIEL S. PARKER  
CHRISTINA S. COOPER  
*Attorneys for Cristian Ulmanu*  
PARKER AND CARMODY, LLP  
30 EAST 33<sup>RD</sup> ST. 6<sup>TH</sup> FLOOR  
NEW YORK, NY 10016  
Cell: (917) 670-7622

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
UNITED STATES OF AMERICA

v.

*proposed*

**ORDER**

**19 Cr 651 (LTS)**

CRISTIAN ULMANU,

Defendant.

---

Defendant CRISTIAN ULMANU seeks to enter a guilty plea in a proceeding to be conducted by video or telephone conference instead of a personal appearance in court. In view of the ongoing pandemic, video and telephone conferencing have been employed by judges in the Southern District of New York on numerous occasions. This Court finds that any further delay in this proceeding would result in serious harm to the interests of justice. Proceeding by video or telephone conference with a guilty plea proceeding advances Mr. Ulmanu's case and furthers justice without undue delay. *See* § 15002 (b)(2) of the Coronavirus Air, Relief, and Economic Security ("CARES") Act.

The Court directs that Mr. Ulmanu be permitted to enter his guilty plea in a video or telephonic proceeding.

SO ORDERED:

Dated: New York, New York  
April \_\_, 2021

---

THE HONORABLE LAURA TAYLOR SWAIN  
United States District Judge  
Southern District of New York